

PRIVACY STATEMENT

COBALT SPEECH AND LANGUAGE, INC.

Updated: August 16, 2019

1. Purpose – Cobalt Commitment to Data Privacy

At Cobalt Speech and Language, Inc., a Delaware company, including each of our wholly owned subsidiaries (together “*Cobalt*”), we are committed to safeguarding and preserving your privacy and the privacy of all those who use our services. The policy set forth below outlines the personal data that Cobalt may collect, how Cobalt uses and safeguards that data, and with whom we may share it. This policy is intended to provide notice to individuals regarding personal data in an effort to be compliant with the data privacy laws and regulations of the jurisdictions in which Cobalt operates.

Cobalt encourages our employees, independent contractors, customers, suppliers, commercial visitors, business associates, investors and other interested parties to read this policy. By using our website or submitting personal data to Cobalt by any other means, you acknowledge that you understand and agree to be bound by this policy, and agree that Cobalt may collect, process, transfer, use and disclose your personal data as described in this policy.

2. Personal Data

Cobalt is committed to maintaining all reasonable precautions to ensure the privacy and security of personal data gathered by Cobalt. During your use of our website or through other communications with Cobalt, personal data may be collected and processed by Cobalt. In general, Cobalt collects personal contact information (e.g. name, company, address, telephone number and e-mail address), which you knowingly provide either by registration, survey, answering questions or otherwise for use in our commercial relationship. At times we may collect additional personal data that you voluntarily provide, including, but not limited to, job title, additional contact information, date of birth, hobbies, areas of interest, and professional affiliations.

If you send any unsolicited data to Cobalt by any means, you explicitly consent to the storage, destruction, processing, disclosure, and/or any other use by Cobalt or any subcontractor of Cobalt.

3. Use of Personal Data

Cobalt's website is intended to be used by Cobalt customers, commercial visitors, business associates, investors, and other interested parties for business purposes. Personal data collected by Cobalt through its website or by other means is used in support of our commercial relationship with you, including, but not limited to, the processing of customer orders, orders from vendors, managing accounts, learning about customers' needs, responding to inquiries, and providing access to information. Also, in compliance with the laws and regulations of the relevant jurisdiction to support our relationship with you:

- we may share personal data with our worldwide affiliates to better understand your business needs and how we can improve our products and services;
- we may use third party service providers to assist us in collecting, assembling or processing personal data in connection with services related to our business relationship;
- we (or a third party on our behalf) may use personal data to contact you about a Cobalt offer in support of your business needs or to conduct online surveys to understand better our customers' needs; and
- we may use personal data for marketing and promotional activities.

If you choose not to have your personal data used to support our customer relationship (especially direct marketing or market research), we will respect your choice. We do not sell your personal data to third parties, nor share it with third parties except as set forth in this policy. Cobalt will retain your personal data as long as you maintain a customer relationship with Cobalt and/or if you have registered to receive marketing or other communication from Cobalt, until such time as you request that we delete such personal data.

4. Third Party Service Providers

Cobalt is the commercial operator of its website and uses service providers to assist in hosting or otherwise acting as data processors, to provide software and content for our sites and to provide other services. Cobalt may disclose personal data supplied by you to these third parties who provide such services under contract to protect your personal data. In addition, where consistent with the laws and regulations of the relevant jurisdiction, Cobalt may disclose personal data if such disclosure:

- is a use of the personal data for an additional purpose that is directly related to the original purpose for which the personal data was collected;

- is necessary to prepare, negotiate and perform a contract with you;
- is required by law or the competent governmental or judicial authorities;
- is necessary to establish or preserve a legal claim or defense;
- is part of a corporate restructuring, sale of assets, merger or divestiture; or,
- is necessary to prevent fraud or other illegal activities, such as willful attacks on Cobalt information technology systems.

5. International Data Transfer

For our customers in Switzerland and the European Union (EU), please note that Cobalt (as a US based company) operates also through its direct and indirect subsidiaries in countries outside of Switzerland and the EU (including the US) and may involve certain third parties (as described above). If you use our websites or web portals, all information, including personal information, may be transferred to Cobalt (including subcontractors that may be maintaining and/or operating our website) in the United States and elsewhere and may be transferred to third parties that may be located anywhere in the world. Although this may include recipients of information located in countries where there may be a lower level of legal protection for your personal information than in your location country, we will protect your information in accordance with requirements applicable to your information and/or location. Specifically, for data transfers out of the EU, Cobalt will utilize data transfer agreements containing the Standard Contractual Clauses. By using our websites or web portals, you unambiguously consent to the transfer of your personal information and other information to the United States and elsewhere for the purposes and uses described herein.

6. Non-Personal Data Collected Automatically

When you access Cobalt's websites or web portals, we may automatically (i.e., not by registration) collect non-personal data (e.g. type of Internet browser and operating system used, domain name of the website from which you came, number of visits, average time spent on the site, pages viewed). We may use this data and share it with our worldwide affiliates and related service providers to monitor the attractiveness of our websites and improve their performance or content. In this case, processing is performed on an anonymous basis and at Cobalt's discretion.

7. Other Online Data

In addition, certain online technical applications or other interactions you have with Cobalt may require the entry of business and technical data. By providing the requested information, you are consenting to the processing and storage of such information by Cobalt. Unless Cobalt is advised that you want this information removed from Cobalt's server, such information may be retained by Cobalt and used for future commercial communications. A request for removal of this information can be made at the contact information provided below. Cobalt will take all reasonable precautions to assure that no such information will be provided or divulged to other third parties, except, if applicable, those third parties performing site hosting, maintenance, and related site service activities.

8. "Cookies" – Information Stored Automatically on Your Computer

Cookies are information stored automatically on a website user's computer. When a user views Cobalt's website(s), Cobalt may store some data on the user's computer in the form of a "cookie" to automatically recognize the user upon future visits to Cobalt's website(s). Cobalt will make reasonable efforts to ensure compliance with the laws and regulations of relevant jurisdictions with regard to cookies.

9. Children

Cobalt will not knowingly collect personal data from children under the age of 18. Cobalt's website(s) is not intended for individuals under 18 years of age

10. Security and Data Integrity

Cobalt will take reasonable precautions to protect personal data in its possession secure against the risk of loss, misuse, unauthorized access, disclosure, alteration and destruction. Cobalt periodically reviews its security measures in an effort to ensure the privacy of personal data.

Cobalt will use personal data only in ways that are compatible with the purposes for which it was collected or subsequently authorized by you. While Cobalt will take reasonable steps to ensure that personal data is relevant to its intended use, accurate, complete, and current, Cobalt is also relying upon each individual to assist in providing accurate updates of his or her personal data.

11. Links to Other Websites

Cobalt website(s) may contain “links” to websites owned and operated by third parties. By accessing these links, which are provided for your convenience, you will leave our site and will be subject to the privacy practices of the other website. This policy does not apply to any personal information you provide to unrelated third parties.

12. Data Retention

In general, Cobalt will only retain personal data for as long as needed for the specific purpose of processing and in accordance with Cobalt's records management policy, or as otherwise required by the laws and regulations of a particular jurisdiction. For example, data will be retained during the time period that you are authorized to use Cobalt website(s), including any Cobalt tools accessible through our website(s). Upon termination of such authorization, your personal data related to use of Cobalt website(s) will be removed.

13. Data Access and Correction

Upon request, Cobalt will grant individuals reasonable access to personal data that it holds about them. In addition, Cobalt will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete. Cobalt also relies upon each individual to assist in providing accurate updates of his or her personal data. In order to access, correct, amend, or delete the personal data Cobalt holds about an individual, the individual should contact the following:

PHONE: +1-857-600-2728 | **EMAIL:** dataprivacy@cobaltspeech.com

14. EU Data Privacy Rights

If your personal data is processed in the EU or you are a resident of the EU, the EU General data Protection Regulation grants you certain rights under the law. In particular, the right to access, correct, or delete the personal data Cobalt holds about you.

To the extent required by applicable law, Cobalt will grant individuals reasonable access to personal data that Cobalt holds about them and will take reasonable steps to permit such individuals to correct, amend, or delete information that Cobalt holds about them. Cobalt also relies upon each individual to assist in providing accurate updates of his or her personal data. In order to access, correct, amend, or delete the

personal data Cobalt holds about an individual, the individual should contact his or her Cobalt commercial contact or contact us at the following email address: dataprivacy@cobaltspeech.com.

If you have a comment, question, or complaint about how Cobalt is handling your personal data, we invite you to contact us in order to allow us to resolve the matter. In addition, individuals located in the EU may submit a complaint regarding the processing of their personal data to the EU data protection authorities (DPAs). The following link may assist you in finding the appropriate DPA: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

15. Changes to this Policy

Cobalt reserves the right to modify this policy from time to time in order that it accurately reflects the legal and regulatory environment and our data collection principles. When material changes are made to this policy, Cobalt will post the revised policy on our website.

16. Cobalt Applicant Privacy Notice and Cobalt Employee Data Privacy Policy

More information on Cobalt's Applicant Privacy Notice for job applicants can be found on our website at www.cobaltspeech.com. Employees can obtain copies of Cobalt's Employee Data Privacy Policy through contacting a member of management.

17. Questions and Comments

If you have any questions or comments about this policy (e.g. to review and update, or remove your personal data from our database) please contact us at 857-600-2728 or dataprivacy@cobaltspeech.com.